

REMARKS

Claims 1-17 are now pending in the application. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the remarks contained herein.

REJECTION UNDER 35 U.S.C. § 103

Claims 1-4, 6-7, 11-14 and 17 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Squeglia et al. (U.S. Pub. No. 2002/0156692A1) in view of Grayraud et al. (U.S. Pat. No. 5,436,637). Claim 9 stands rejected under 35 U.S.C. § 103(a) as being unpatentable over Squeglia et al. in view of Grayraud et al. and further in view of Demetriades et al. (U.S. Pub. No. 2004/0010578). Claims 8 and 15 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Squeglia et al. in view of Grayraud et al. and further in view of Griffiths (U.S. Pub. No. 2002/0116316).

These rejections are respectfully traversed.

With respect to Claim 1, the combination of Squeglia and Grayraud is improper and does not teach, disclose, or suggest downloading a hint file prior to a request to order a part or an inquiry for the part is made to a parts catalog system.

As best understood by Applicants, Squeglia is directed to providing a technician with access to information, such as a monitoring and diagnostic service center (MDSC) 20, following a request for the information. Grayraud, on the other hand is directed to a graphical user interface (GUI) that provides hint files for operating a window-based system. In order to justify the combination, the Examiner alleges that:

It would have been obvious to one of ordinary skill in the art at the time the invention was made to implement Squeglia et al.'s system with the

downloading the hint file to the system 120, a parts catalogue in association with the part identifier prior to a request to order to at least one part or an inquiry the part is made to the parts catalogue system so that whenever said request to order the at least one part is entered into the parts ordering system or said inquiry for the part is made to the parts catalogue system, the hint will be displayed in order to help user with different techniques to find the accurate part and help the user with highly intuitive including those who are untrained the use of software since such arrangement with whenever request to order the a least one part is enter into the system, the hint will be displayed for the stated purpose has been well known in the art as evidenced by teaching of Gayraud et al.

Page 4, Office Action September 19, 2007. It is unclear to Applicants exactly what teaching or suggestion for the combination is provided in either reference and/or based on the Examiner's reasoning as set forth above.

Further, the Examiner's somewhat confusing explanation falls far short of the type of **explicit analysis** that is required by the Supreme Court in KSR Int'l v. Teleflex Inc., 550 U.S. ____ (2007). Absent such an express teaching or suggestion in the references, the explicit analysis and reasoning must be supplied by the Examiner. *Id.* In other words, the Examiner is required to provide explicit reasoning as to why one skilled in the art would be motivated to construct a manufacturing system that includes downloading a hint file prior to a request to order a part or an inquiry for the part is made to a parts catalog system. Here, the Examiner merely notes that "It would have been obvious to one of ordinary skill in the art at the time the invention was made to implement Squeglia et al.'s system with the downloading the hint file to the system 120" and fails to provide explicit analysis and reasoning as required.

For example, in Squeglia, an expert repository 42 stores MDSC information. Page 4, Paragraph [0034]. Squeglia does not disclose, teach, or suggest that the MDSC 20 or expert repository 42 provide information prior to a request for the

information. Instead, Squeglia, merely includes providing access to database information, which is common in the prior art. In fact, the Examiner noted that *when* a parts ordering module 58 orders a part, all information is then downloaded. More importantly, however, is that Squeglia is directed to a parts ordering system and has **nothing to do with providing operating hints for a GUI**, as does Grayraud.

As best understood by Applicants, Grayraud, is directed to a GUI that provides hint files for operating a window-based system **that has nothing to do with ordering manufacturing parts**.

In contrast, Claim 1 includes downloading the hint file *prior* to a request to order the part or an inquiry for the part to the parts catalog system prior to a request for a part. In other words, a technician is primarily requesting a part; and the hint file is automatically provided "whenever" such a request is made and not after a downloading procedure.

A typical parts ordering system, as in Squeglia will only download part data *after* a request to order a part, which is a common method for ordering parts. In other words, an order is made, and the part is provided along with instructions for attaching the part. In contrast, Claim 1 provides immediate hints on site before any order is made in order to avoid incorrect diagnosis of an observed problem. In other words, once the part is ordered, as in Squeglia, it is already too late to avoid an incorrect diagnosis. Grayraud fails to cure the deficiencies of Squeglia and merely provides hints on how to operate a GUI. These operating hints have nothing to do with ordering parts. The amount of memory required to store hints for a typical GUI/window system is vastly less than the amount of memory required to provide hints for a typical manufacturing diagnosis, which

may relate to hundred of thousands of parts. Therefore, it is not uncommon for a windows-type system as in Grayraud to download all hints that are available and store them on a hard drive, but this in no way suggests that it is applicable to ordering of parts.

Therefore, Claim 1 is allowable because each and every element of Claim 1 is not taught, disclosed, or suggested in the prior art, and because the references were improperly combined. Claims 7 and 12 are allowable for at least similar reasons as Claim 1. Claims 2-6, 8-12, and 13-17 ultimately depend from Claims 1, 7, and 12 and are allowable for at least similar reasons.

ALLOWABLE SUBJECT MATTER

The Examiner states that Claims 5, 10 and 16 would be allowable if rewritten in independent form. Applicants reserve the right to amend Claims 5, 10 and 16 at a later date if needed.

CONCLUSION

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action and the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested

Respectfully submitted,

Dated: December 11, 2007

By: 

Gordon K. Harris, Jr.
Reg. No. 28615

Ralph E. Smith
CIMS 483-02-19
Chrysler LLC
800 Chrysler Drive
Auburn Hills, Michigan 48326-2757
Phone: 248-944-6519